COMMENTS RE: DNS 14-059
GULCH ROAD CONSTRUCTION

Submission	Response
Deborah Essman, KCFSC The Kittitas County Field and Stream Club supports this S.E.P.A. regarding the relocation of Stray Gulch Road in the Colockum Wildlife Area. Members of our organization have been actively involved with WDFW in the planning of this road relocation. This project will increase recreational opportunity by allowing recreational driving on Stray Gulch Road which was lost as a result of the road abandonment in 2012. We have been anxiously but patiently waiting for its successful conclusion. Traditional motorized access on green-dot roads in the Colockum/Quilomene/Skookumchuck/Whiskey Dick landscape is a priority for our membership and others in the community.	Thank you for your comment.
Dale Bambrick, Chief, Columbia Basin Branch I recently learned the WDFW proposes to rebuild the Stray Gulch road. This is a puzzling acquiescence to the short-sighted and selfish agitation of a few individuals. When the road was abandoned in 2012, WDFW set in motion the recovery Tekison Creek, a sensitive shrub steppe stream and riparian habitat. Protection of such habitats helps ensure that the Colockum Wildlife Area can serve the very purpose for which it was acquired. While a portion of the new road will be located a bit more upland than the old, it would harm fish and wildlife to a similar extent. The new road would speed the rate of runoff, depleting late season stream flow. It would deliver many tons of sediment to Tekison Creek annually, reducing fish habitat quality. Perhaps most significantly, it would discourage use of the area by beaver or necessitate their removal should they become established and threaten the road. Shrub steppe streams like Tekison are remarkably diverse but extremely vulnerable habitats. It's all about the water, and by August there is very little of it.	This road location is sensitive to the proximity to special and/or vulnerable habitats. Care was taken to locate the road out of the riparian area where the previous road was located. We also carefully avoided steep slopes, talus slopes, and heavily vegetated areas. The footprint of this road was designed to be primitive and minimal. Disturbed ground will be seeded with native grass seed. This is a road location that some users found important to maintain for recreational purposes. The new road is located out of the floodplain, and

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Without fully functioning floodplain storage and without beaver, these streams become intermittent and their habitat value is lost. This is obviously and in particular true for fish. At a time when the WDFW scrambles to fund the essential management actions on its wildlife areas it make no sense to waste funds on a road to nowhere. As a short drive on most wildlife areas will attest, WDFW lacks funding to properly maintain many of the roads that should remain open. Closing very low priority roads like Stray Gulch is an essential budget management strategy. When one also considers the ecologic costs, the decision to keep the road closed is nearly self-executing. If the Stray Gulch road can't be kept closed it seems unlikely that any road on WDFW land can be permanently closed. I urge you to reconsider this proposal. I believe that an overwhelming majority of sportsfolk would oppose this proposal if they understood the context. Certainly all responsible resource managers would favor keeping this road closed. Mustering the resolve to close this road in the first place was a laudable act. To back away now would be extremely disappointing and contrary to the WDFW's mission and the purpose of the Colockum Wildlife Area.	beaver activity would not impact or threaten the new road. We recognize the value beavers have in this system for beneficial effects on watershed function and wetland health, and this project would be compatible with increased beaver activity in Stray Gulch. The primitive nature of the road defined by this project means there will be a minimal maintenance commitment to drivability issues. WDFW would still address any resource damage issues stemming from a road condition effect. This is consistent with the Agency's commitment to address such issues elsewhere on WDFW lands.
JEN WATKINS, CONSERVATION NW We are writing to submit comments on the Determination of Non-Significance (DNS) 14-059 and Environmental Checklist for the Stray Gulch Road Construction. We believe this decision and analysis are inadequate to address the previously recognized significant issues with a road in Stray Gulch, to recognize and utilize "environmental information you know about" relevant to this proposal, to be consistent with state legislative language and show responsible use of public funding, and to engage relevant stakeholders from diverse perspectives in developing the proposal.	Thank you for your comments regarding road construction in the Stray Gulch drainage of the Colockum Wildlife Area. Your concerns on habitat protection and impacts to fish and wildlife and engaging stakeholders are important for us to hear.

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We respectfully request that you withdraw the DNS and issue a Determination of Significance on the road construction and prepare an Environmental Impact Statement.	
Recognized Significant Issues This road construction project is fairly unique, as it benefits from extensive materials identifying natural resource issues related to the presence and use of roads in this landscape from the original 2012 Colockum Stray-Tekison Road Abandonment Decision1 and accompanying documents as well as the application and documentation to the Washington State Recreation and Conservation Office (RCO)2. The project application documented 15 species and communities with special status in this "critical habitat". The Scoring Criteria for the grant states that "the roads in Stray Gulch and Tekison Creek compromise the habitat functions of these drainages in several ways. Stream-adjacent roads impact water quality through erosion, lowering the value of the stream for aquatic life. Motorized vehicles contribute to the spread of noxious weeds, which invade and reduce the quality of habitats for wildlife species. These impacts affect adjacent habitats and even the entire Wildlife Area. For example, Stray Gulch and Tekison Creek are creeks that drain to the Columbia River. Noxious weeds, once established can spread and reduce habitat quality in entire drainages and watersheds." The Scoring Criteria goes on to document the biological importance and uniqueness of the shrub steppe habitat that the Environmental Checklist indicates will be impacted by this road construction by stating the site is "dominated by big sagebrush and bitterbrush with an understory of native grasses such as bluebunch wheatgrass, sandberg bluegrass, and forbs such as lupine and balsamroot.	We would like to be clear that the new road location is different from the previously abandoned road location. The project as a whole is different. As an agency we have to strike a careful balance in our management of state land and resources. State law directs the department to conserve native fish and wildlife and their habitat while supporting sustainable fishing, hunting, and wildlife-related recreation. It is this balance that brings us to creating road access for the use of hunters and recreationalists that is carefully designed to conserve and protect the surrounding ecosystem.
Good condition shrub-steppe provides habitat for a diversity of fish and wildlife species, and for a comparatively high density of animals. Shrub-steppe habitats are one of the fastest disappearing	The Stray Gulch area is important for recreational use, including hunting and wildlife viewing. We have taken great care to locate the new road away from the stream and in a stable location. There will be minimal vegetation disturbance, with no disturbance of vegetation in the riparian areas. We will be taking a multi-faceted approach to erosion and sediment control through the use of weed-free straw mulch, native grass seeding of the road surface and all exposed soils, natural contouring of the road, and use of drain dips and water bars located to maximize filtration. The road location itself was identified to allow for an out sloped road prism, to avoid steep slopes or talus, and to maximize distance from water. The design is for a primitive road with a grass surface.

habitats in Washington State, primarily due to conversion to agriculture, residential development, or damage from overgrazing. The Colockum supports some of the state's best remaining native shrub-steppe communities. The shrub-steppe habitats in Tekison and Stray Gulch are still intact due to the remoteness of the site, their protection from development, and they have not received livestock grazing for at least 30 years….The project is considered an important effort in the maintenance and restoration of the limited shrub-steppe habitats on the Colockum Wildlife Area and of Washington State. The Colockum is located between two remaining sub populations of sage grouse in eastern Washington, and is the only contiguous habitat between these populations. The State of Washington Greater Sage Grouse Recovery Plan (2004) identifies protecting the remaining habitat and restoring degraded habitat as key to maintaining sage grouse populations in Washington…the greatest need in this area is to close these roads to motorized vehicles and restore the damaged areas through grass, shrub and tree plantings, and by weed control….Infestation by noxious weeds has been an on-going problem in this area as well, as vehicles continue to carry weeds along the roads." It states that into the future "WDFW will have full control and more management options to protect and enhance this area." These documents produced recently and in times when shrub-steppe has only gained recognition for its importance to biodiversity in our state, clearly document significant issues as recognized by the State. The DNS and environmental checklist for the road construction proposed do not recognize nor adequately address these issues including management of noxious weeds, disturbance of intact and remote shrub-steppe habitat, and impacts to sage grouse management and recovery plans. The DNS and Environmental Checklist also do not speak to how the new project is either consistent or changes the long-term assurances made to the public for how this area would be managed. The original decision went through both	The minimal footprint of 10-12 feet wide is intended to minimize any impacts to the landscape. We have carefully taken steps not to negatively impact the shrub-steppe. The road location as proposed was carefully located outside of the functioning riparian area for Stray Gulch Creek. It is located upland at elevations above the channel that will allow for full channel and floodplain functionality. The entire road and all disturbed soils will be seeded with a native grass seed mix and mulched. This includes the road surface itself. These efforts will reduce the introduction of noxious weeds and allow for a grass surfaced primitive road. The minimal footprint of the new construction will allow for recovery of sagebrush and bitterbrush immediately adjacent to the road. The primitive design and native surface of the road is more consistent with a trail than a road as discussed by the Washington Wildlife Habitat Connectivity Working Group. The road surface will be very similar to immediate surroundings. The roadbed is out sloped and contoured to the existing topography to minimize and balance cuts and fills to minimize unnatural features for wildlife.

a public review process and competitive public funding process, both of which this new proposal must address.	
Utilization of Existing Science to Inform Decision Question #8 on the Environmental Checklist states "List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal" and the only answer provided was "the location has been reviewed for species of concern with no findings." This ignores recent environmental analyses conducted by your own agency specific to this landscape and recreational use in the Naneum to Columbia River Recreation Plan, science that your agency has led in the creation of through the Washington Wildlife Habitat Connectivity Working Group, and conservation planning conducted through the Arid Lands Initiative.	It is important to clarify that the new road location is not in the same location as the road that was abandoned. The abandoned road was being undercut by the stream, as well as capturing water from the stream in locations and channeling it down the road; it was also dividing riparian vegetation. The new road was specifically located to avoid all of those issues. The road as described is out sloped with no ditch, and drainage features such as drain dips and water bars at naturally occurring low spots. Physically and visually, this road is designed to blend with the surroundings.
Natural resource staff from your agency in coordination with the Department of Natural Resources have generated and presented biological assessments of the Naneum to Columbia River Recreation Planning Area that produced tri-composite maps for summer, summer plus seasonal, and winter recreational motorized use that incorporated biological factors, soils and geology, and management issues. In a review of the maps compiled on March 20, 2013 available online the Stray Gulch is rated as "low suitability" under all seasons for motorized use. According the biological component4 of the tri-composite the Stray Gulch Road Construction project area overlaps (or appears to from the maps available as PDF, although Section 32 is color blocked out) wetlands, fish habitat, riparian habitats, elk winter range, bighorn sheep habitat, mule deer habitat, cliffs and bluffs, and shrub steppe habitat. Of these issues that the proposed action overlaps, six were identified in this analysis to offer "low suitability" to recreational facilities. Low suitability was defined for this analysis as "Areas with long-term considerations. These primarily include Habitat Conservation Plan protected habitats and State priority habitats." The Environmental Checklist	A further clarification is the tri-composite maps were not intended or represented to eliminate or restrict developments . It was an information tool to provide guidance to the planning team members . The majority of the Eastern Colockum Wildlife Area is identified as low suitability. We still have a commitment to provide recreational access in these areas. Because it is identified as low suitability, we are taking the extra measures to ensure it is developed as a primitive road. The Stray Gulch area was identified as a high priority recreational opportunity by users, and the road relocation has been supported by the legislature.

notes the presence of species and habitats in the project area, but offers no discussion of the potential impacts or reference to this existing agency analysis. The Washington Department of Fish and Wildlife has been the co-lead agency for the Washington Wildlife Habitat Connectivity Working Group since its inception in 2007. In 2010, the Washington Connected Landscapes Project: Statewide Analysis5 was released identifying landscape scale patterns to maintain a connected network of habitats for wildlife in our state. Of the focal species analyzed that are listed as present within this landscape included bighorn sheep that shows the project proposal overlaps key habitat in a habitat concentration area and areas of low resistance for bighorn movement on the landscape (Appendix B). This analysis was followed by a finer scale analysis of the Columbia Plateau ecoregion in recognition of the importance of remaining options for conservation and restoration in this highly fragmented landscape. As the Scoring Criteria in the RCO grant indicated, this analysis confirmed the importance of the Colockum Wildlife Area including the Stray Gulch shrub-steppe in providing habitat connectivity for sage grouse (Appendix A). In addition to the analyses, the working group has produced tools to allow individuals and organizations to test scenarios for restoration and management in the Columbia Plateau that are available online. Although the definition of connectivity in these efforts is broader than the "migration routes" in the Environmental Checklist's Question 5c, it is important information recognized by the State and federal government in policy (federal government relevant due to ownership of Section 32). Finally, the Washington Department of Fish and Wildlife has invested staff capacity and resources to the conservation planning within the Arid Lands Initiative. The Arid Lands Initiative (ALI) is a diverse group representing public, private, and tribal interests (including the Service) working together to conserve and restore a viable, well connected	We reviewed the site specifically to avoid areas of biological, cultural, and geological concern. By carefully locating the road, managing the drainage, and creating distance between the road and the creek, we are balancing habitat/wildlife conservation and the goals of the recreation plan with the needs of the users. We want to be clear that we are only addressing the comments for the Stray Gulch Road project. Comments addressed to the draft recreation plan are not part of this project specifically and have a separate comment process.

ecosystem in eastern Washington's arid lands – including the related freshwater habitats that sustain native plant and animal populations and support local communities with compatible economic development. In 2011 ALI produced a "Threats Ratings - Table" (Appendix C) that identifies that roads pose a medium threat to shrub-steppe grassland, a very high threat to sage grouse habitat, and a combined high threat to the arid landscape. Additionally, recreation poses a "medium" threat to sage grouse habitat with a medium threat overall to the arid landscape. While these are generalized rankings of threat on the landscape, it would seem the exercise is informative to considering proposals to change the status quo in a manner that would increase the threat in relevant habitats after the creation of this table.	Connectivity of habitat is an important consideration, and led to the minimal or primitive road design. In order to maintain a connected landscape and protect the primitive nature of the area, the new road is narrow, has a native surface, and will create minimal topographic manipulation. These considerations are important to recognize, as it is not a mainline forest road with a gravel surface and large ditches, it is not a paved road with high volume of traffic. The road will be similar in nature to the previous road, only moved away from the creek and riparian area. The construction of this road will not increase road quantity over the previously abandoned road, nor do we expect use to increase over what the previous road supported.
For the range of habitat and species values in this landscape, it is inadequate for the Environmental Checklist to simply state that the area has been reviewed and no findings arose. Each of the findings listed above confirm the importance of the original closure in Stray Gulch not only for its stream adjacency, but for the terrestrial values of this habitat. All values that your agency has been a leader in developing and interpreting high quality science to guide the conservation and management of.	In the connectivity analysis you reference, the ways roads negatively impact connectivity were defined as: 1) creation of inhospitable conditions (e.g., desiccating conditions for amphibians); 2) creation of physical barriers; 3) fatal attraction (e.g., warm road surfaces attracting snakes); 4) increased mortality due to collisions; and 5) behavioral alienation (e.g., avoidance of high traffic volume). None of these conditions would typify the nature of the proposed primitive, low-use road associated with this project.
Consistency with Legislative Direction We understand that this proposal is a direct implementation of Washington State legislative proviso language from 2013 that directed the Washington Department of Fish and Wildlife that "$25,000 of the appropriation is provided solely for the department to construct a primitive road, of a minimum of one mile, with no adverse impacts on streams or riparian areas, in the Naneum road planning area within Kittitas county. This is to replace the lost general public access as a result of the Stray-Tekison road abandonment. The department shall collaborate in the placement of the road with the Kittitas county field and stream club." (emphasis added).	We appreciate your understanding that this project is a direct implementation of a legislative proviso. It is important to understand that the collaboration was a very important part of that proviso. This road location will not disturb riparian vegetation or function, and it should not have an adverse impact on Stray Gulch Creek. The re-routing of the new road segments, careful design relative to construction, and a re-vegetation

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The Naneum to Columbia River Recreation Plan, which we assume is the road planning area referenced in the legislation, is over 230,000 acres of state land in Kittitas and Chelan Counties. Analyses already discussed in this document show where in that planning area road construction would be of moderate or high suitability, and where numerous options to construct a road from an existing non-Green Dot system road exist. The landscape that the road construction proposal proposes to enter is the largest roadless area on the Colockum Wildlife Area (and adjacent state ownerships in arid lands) that we find. Additionally all of the information presented to the public on this location show it is of low suitability for road construction, and the original closures garnered public supported (on record by NOAA Fisheries, citizen, and Trout Unlimited). It seems a mis-use of public dollars to construct a road within 50-250 feet of a previously closed road segment (closed with public state dollars) when many of the risks from this new road repeat the reasons the previous segments were closed and restored. We believe that is likely why the legislative proviso language was written wisely enough to be interpreted broadly across a much wider acreage to offer access into this important wildlife area for the public, but in a way that uses our public funds wisely to protect and manage our natural resources. Additionally, for this specific road proposal the legislation is clear that there are to be "no adverse impacts on streams or riparian areas". The Environmental Checklist states that the proposed road will not disturb "riparian areas" and will remain a "safe distance" from live water, there is no detailed explanation of the proposal and the rationale and models to support its lack of impact with riparian areas, streams, and water. The Environmental Checklist states that the road will be within 200ft of a stream in its construction (sometimes as close as 50 feet), and if will cross 2 seasonal streams that only have water when the	strategy are expected to effectively mitigate the environmental issues that were associated with the previously closed road. The previous road was frequented by turkeys, deer, elk, and other wildlife. Again the primitive nature of the road, along with surfacing that will mimic the natural surroundings were part of the consideration to provide vehicular access to this unique area while balancing the importance of wildlife and their habitats. These features, coupled with modest-to-low use of the road should allow the maintenance of habitat connectivity across the Stray Gulch drainage. As to the exact location of the road and distances from the stream, the Stray Gulch area was reviewed for special geologic formations and habitats, such as talus slopes, steep slopes, and areas that may channelize water. Minimizing conflicts with these features was achieved by design elements, specifically horizontal distance and elevation above the creek. The new road location begins where the current green dot road

road is not anticipated to be used. Within this comment period I have not been able to walk the road segment yet (although I intend to), but upon examining a map the topography in the Stray Gulch appears steep and narrow raising the question as to whether any road segment in this gulch could avoid potential impacts to the stream downslope. Additionally although the road itself has been located upslope and is not removing any actual riparian vegetation, that does not mean there are no adverse impacts to streams and riparian areas. The new road in this location is likely to still increase the rate of run-off from any snowmelt and precipitation through its compacted surface interrupting the natural vegetated slope, which impacts late season flow in the stream. The road is still located within a sediment delivery zone, often discussed as 300 feet from the stream on the adjacent Okanogan-Wenatchee National Forest where your agency coordinates on projects.	was barricaded. From there the road continues to climb away from the creek, but maintains a safe and stable distance from rock outcrops and talus slopes. As stated in the SEPA there are two draws that cross the new road location. The location of these crossings were carefully selected as to not capture water with the road, and to be able to cross the draw as efficiently as possible with the least amount of ground disturbance. The drainages the new road location crosses are seasonal, only running water during intense storms, high snowmelt runoff, or rain on snow events. The draws do not have a channel connection to Stray Gulch creek but rather fan out in overland flow.
Engaging Relevant Stakeholders We understand that the DNS and Environmental Checklist are public documents that were shared through the SEPA mailing lists and online for a 14-day public comment, which was extended in response to multiple requests an additional 7 days. It would seem that with a project that has such clear additional stakeholders, an extra effort of review and engagement is warranted.	The response in the SEPA document on safe distance from the creek was based on knowledge that sediment is generated from water, slope, soils, and disturbance. The slope, distance, concentration of water and vegetation between the new road and live water determines the likelihood for sediment delivery. The road location has a rolling grade; there is a grassed surface and gentle slope. Also, below the new road location is the old road location that serves as a grade break and sediment control strip. The rolling grade of the new road will minimize concentration, the elevation above the creek will allow for spreading and dissipation of overland flow, and the vegetation of both the road and the surrounding terrain will filter out any road generated sediment. Modelling in this situation is unreliable because there is no ditch concentrating water; the road is native surface with grass, and out sloped, and the surrounding terrain is grass and rock.
In addition to being a partner in the Arid Lands Initiative, the US Fish and Wildlife Service owns Section 32 which this project proposal bi-sects. The state manages this section in coordination with US Fish and Wildlife Service per a Memorandum of Understanding (Attachment D). This MOU states that the area is to be managed as a wildlife refuge, public shooting area, or game management unit and that only uses consistent and compatible with this purpose are allowed. The State is also to report to the use or non-use of these lands within the MOU annually on August 1st. Since the USFWS has a current priority for arid lands, habitat connectivity, and sage grouse – all mentioned previously as relevant to Section 32	

and Stray Gulch – we request confirmation of consultation and approval from them on the construction of this road segment as well as the relevant annual reports discussing the Stray Gulch Road (i.e. 2012 after its closure and 2014 prior to its opening). Less formally, we were surprised to learn that individuals and organizations that had commented on the original road closures in this area were unaware of the proposal for a road within 50-250 feet to be reconstructed. In addition to the robust discussions with Kittitas Field and Stream and other interests in their opposition to the road closure, there are public comments to WDFW on record supporting the road closure and others who followed the state funding process for restoration projects including the Stray-Tekison roads. Included in these stakeholders is the Colockum Wildlife Area Advisory Committee and the Advisory Committee pulled together for the Naneum to Columbia River Recreation Planning processes. Reaching specifically out to these stakeholders that have shown a vested interest in the habitat values of this area through public comments and engagement, and in looking at alternatives for spending the $25,000 for road construction produces a more diverse conversation on the benefits and risks to providing additional access in the "Naneum road planning area" that produces a more informed final decision. This kind of engagement of stakeholders goes beyond seeking public comment, but in extending the same collaboration that was legislatively directed to include one organization to all those interested. We recognize the political sensitivity around issues of access on our public lands and believe that this sensitivity highlights the need for diverse stakeholder engagement, transparency, and decisions based on good information. If we are simply unaware of an outreach effort that was conducted, we seek information to better understand the process to engage diverse stakeholders in this effort. Conclusion	Washington Department of Fish and Wildlife (WDFW) seeks to balance providing public access to state-managed wildlife areas with other conservation-oriented mandates. Public recreation is an important WDFW value. Closure of the old road bed occurred because there were documented resource impacts taking place because of the road's specific location. Relocating the road up the hill and away from the creek is a different project with best science taken into account. Impacts to wildlife and impacts to the creek in the form of vegetation disturbance and sediment delivery were carefully considered in locating the new road. A minimal road that treads lightly between established vegetation and rock and talus outcrops was designed to meet landscape level intents pertaining to road densities, conservation of wildlife habitat values, and providing some public access.

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According to your website6, "The Colockum Wildlife Area was established in the mid 1950's to provide and protect critical summer and winter range for deer and elk as well as to perpetuate and improve upland game bird habitat… The primary management concerns and public issues identified in the Colockum Wildlife Area Plan are: • Protecting and enhancing shrub-steppe, riparian and forest habitats. • Maintaining fish and wildlife populations through habitat protection and enhancements. • Monitoring and managing the impacts of public use on wintering elk. • Providing public access compatible with fish, wildlife and habitat protection. • Controlling noxious weeds such as knapweeds and thistles. • Controlling trespass livestock grazing and damage to riparian areas." We believe the same significant issues that were present several years ago that warranted the closure of the Stray-Tekison roads are not only present today, but underscored with additional analyses such as those mentioned in this letter. These include concerns that make the current proposal as presented run contrary to the primary management objectives for the Colockum Wildlife Area including providing public access that is compatible with fish, wildlife, and habitat protection. The DNS and Environmental Checklist do not adequately recognize nor address the natural resource risks posed by this proposal that would allow for an informed final decision by your agency, and we therefore request withdrawal of the DNS and initiation of a more thorough environmental review.	Because of your comments, WDFW will be implementing a monitoring plan to verify that the expected outcomes of this project are verifiable. WDFW will be monitoring vegetation establishment, road drainage, road condition, and evidence of sediment generation. WDFW will visit the site twice a year during peak use in November and April. Monitoring will consist of visual inspection of the road surface for rutting, any channelization of water, and vegetation establishment. The old road bed will also be inspected to see if any runoff from the new road is making its way to the old road location or the stream. The third point of inspection will be where the road crosses the side draws. These crossings will be reviewed for stability, evidence of sediment, and connectivity with the Stray Gulch Creek. Road usage will also be monitored to ensure that users are staying on the road and not impacting vegetation. These inspections will be documented with located photo points and field notes. WDFW plans to monitor for 3 years and continue to evaluate as part of the landscape level adaptive management plan. Again, we would like to summarize the thought and deliberate design that went onto this project. Just to reiterate the project aspects that are intended to avoid impacts to fish and wildlife while protecting their habitats, while still meeting our mission to provide public access opportunities. Summary of Stray Gulch road construction project elements: • Important for recreational use • Located away from the stream • Minimal vegetation disturbance • No physical barriers to wildlife • Multi-faceted erosion control • Engineered location • Minimalistic footprint • Native grass seeding and mulching of surface • Monitoring Plan

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DAVE GIMLIN, Wenatchee Sportsmen's Association (WSA) This SEPA document was prepared 8/12/14 and signed and submitted on 8/20/14. The deadline for public comment is 9/12/11, which makes the comment window 21 days long. This is a very short time in which to respond and therefore some input is provided in the form of questions (we would like answered) rather than objective input. 1. Par. B. 1 indicates "steep slopes". Par. B. 8, h. indicates "YES, SLOPES OVER 30%". Par. B. 1. b however , indicates the steepest slope is "30%". This indicates a steeper operating area than indicated in the construction zone. If this is the case than back hauling rather than side casting material may be required to prevent sediment delivery to the adjacent stream. 2. Par. B.3.c.2 Indicates that "SOME ROAD RUNOFF COULD ENTER THE FORD LOCATIONS ONLY IF THERE IS TRAFFIC DURING PERIODS WHERE THERE IS WATER IN THE DRAW PRIOR TO VEGETATION ESTABLISHMENT." Given that there may be no vegetation established in places on this road surface and the steepness, on parts of the newly constructed, we are concerned that sedimentation and road surface degradation may occur if these roads are used during wet conditions. Our recommendation is that seasonal use be included as part of the administration consideration in developing this road since Wenatchee Sportsmen's Association understands the continual lack of road maintenance funding. 3. Par. B. 5.a. Lists birds and animals that have been spotted in proximity of the road construction site. Deer, Elk, and Big horn sheep, are listed as well as many bird Species. WSA is opposed to the construction of this road because it provides access to elk winter range on the West Bar. If this road is built we believe that it needs to be controlled with seasonal closure as with the southerly part of the Colockum winter range to protect wildlife during its most vulnerable time. We continue to support the DFW Mission: "Serve Washington's citizens by protecting, restoring and	Pertaining to the slopes of the construction area, there are slopes in the vicinity and adjacent to the project that are over 30%. At the exact road location there is a very short section at 30%. The road is located near the top to the very short slope and the amount of material being moved is minimal. No end hauling, or full bench construction is necessary. The fill slope of the road will be compacted and grass seeded with all exposed soils being seeded and covered with straw to prevent erosion. In the SEPA document we list the protective measures that we will take should there be some runoff from the road prior to vegetation establishment including the use of straw, straw wattles, and an outsloped design to minimize concentration of water. Road access in this drainage is important to some recreationalists as a unique driving experience and is consistent with providing wildlife-related recreation. Funding specific to this project was allocated by the legislature and was earmarked for providing primitive road access to replace the opportunity the previous road provided. This road will not provide winter access to West Bar, as the seasonal closure of the road descending onto the Bar will continue to be in effect. No seasonal restrictions on use of the proposed road segments are currently planned; however, clear evidence of a resource issue (e.g., substantial sediment delivery) wherein a seasonal restriction would be a logical preventive measure would be considered.

enhancing fish and wildlife and their habitats, while providing sustainable and wildlife-related recreation and commercial opportunities." This Mission is not addressed under Par.B.12. b. & c. b. indicates "NO, THIS PROJECT WILL INCREASE RECREATIOAL OPPORTUNITIES BY ALLOWING DRIVING UP STRAY GULCH THAT WAS LOST AS A RESULT OF ROAD ABANDONMENT." c. indicates "NONE" as proposed measures to reduce impacts on recreation but has no mention of impact on wildlife as a result of this road development and use. Par.B.14.h. indicates, "THERE WILL BE NO TRANSPORTATION IMPACTS." We believe that this project , as proposed and presented here, will have impacts on both water quality and wildlife. To not address these and mitigate them through seasonal use and/or other administrative restrictions is an oversight and an over simplification of the issues. 4. Lastly, Par.14.f. Indicates, "USING PREVIOUS ROAD USAGE ESTIMATES FROM OTHER HUNTERS AND RECREATIONALISTS, APPROXIMATELY 15-20 TRIPS PER YEAR WILL USE THIS ROAD." In these days of tight budget and prudent policy advocacy by many Washington citizens, who would consider and promote building a road and creating an additional unfunded maintenance challenge to support 15-20 trips per year useage at a projected construction cost of $25,000? That's a projected minimum of $1,200 per trip not including future maintenance. Is this area really the best place to put a road for public recreation if the projected use is that low? Why doesn't DFW use the money to enhance the road system farther West where vehicular access is less controversial and without the impacts on wildlife, especially elk and deer winter range?	The primitive nature of the proposed Stray Gulch Road coupled with the anticipated modest-to-low use of the road and a re-vegetation strategy are expected to effectively mitigate the environmental issues associated with the previous road. This primitive, low-use road is also expected to have no detectable effect on wildlife such as elk, mule deer, and game birds.
TIM GAURON, Kittitas Audubon Society First, news about this proposal comes second hand, and only by chance within the past week did we become aware of it. Kittitas Audubon commented extensively on both the Naneum Ridge to Columbia River Recreation Area (NRCCRA)	Thank you for your comment, however it was received after the official extended comment period.

and WDFW's earlier DNS assignment to opening the road into Whiskey Dick through WA Dept. of Parks land at Vantage. It follows that another road-building plan with another DNS assigned to it would raise serious issues with people who had made a significant effort to be involved in the earlier proposal. Particularly since there was no evident consideration of the many issues KAS raised in its comment on the Whiskey Dick DNS that we felt coincided with those values that we assumed WDFW espoused; issues that pertain in part to the new road construction. The proposed road in Stray Gulch, so near to the road that WDFW closed to protect Tekison Creek, would carry the same environmental hazards as the one you closed. The site is part of a large unroaded area in the Colockum; why this bent to continue adding roads to the complex of Wildlife Areas that are already so very heavily roaded? KAS is aware that the Department is reacting to the self-interests of a group, whose members are heavily into motorized recreation, and who petitioned the Legislature to require another road be built to compensate the road that was closed. Surely this requirement can be met in a more environmentally suitable way – there are near 250,000 acres from which to choose. Assumedly there are potential sites where the biological/ecological criteria is more favorable for a road than the "low suitability" assigned to Stray Gulch. There's something disturbing about WDFW's persistence in support of roads and further road building that is so contrary to what most consider to be its central mission of protecting and promoting wildlife – a role that has predominantly to do with protecting habitat. Kittitas Audubon urges WDFW to abandon this proposal and develop a more suitable one.	

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GLORIA AND JEB BALDI We were dismayed to hear just yesterday that a second Stray Gulch Road is to be constructed within 50 feet of the one closed approximately two years ago for its resource damage. Considering we were involved with letters encouraging the continued closing of a road in the Whiskey Dick area of the Naneum/Colockum last winter for the benefit or elk, why did we not receive any notification that this second road affecting Tekison Creek in the Colockum Wildlife Area was being considered? . How does the Determination of Non-Significance for the Stray Gulch Road support the mission of WDFW by allowing "protection and perpetuate fish, wildlife and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities"? 'Sustainable' is an extremely important goal in your mission. It is known that wildlife, including birds, needs protection from noise and intrusion to reduce stress to allow reproduction to the maximum. Creeks need to be protected from erosion to enhance riparian areas and allow healthy habitat for fish. How can destruction of shrub-steppe, the fastest disappearing habitat in the northwest, to build another road benefit any wildlife? All wildlife that depends on shrub-steppe is in steep decline. All these factors discourage building an additional road in this area. Why would WDFW spend the monies to build a road in an area that already has numerous roads with many miles of riding opportunities? Would not the monies be better spent monitor the area to prevent destruction to the already existing habitat? We are extremely disappointed the WDFW has again tossed aside its goals to the detriment of wildlife and habitat enhancement. Please consider these comments to the Stray Gulch Road DNS…….and reconsider your decision.	Thank you for your comment, however it was received after the official extended comment period.

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LAURA SCHILTZ I learned this week that your agency has proposed to construct over one mile of road in the Colockum Wildlife Area almost adjacent to a road that was closed with public funds just 2 years ago. I reviewed the very basic information provided with your Determination of No Significance online, and found it disappointing and erroneous. The Colockum Wildlife Area is a special place in our state for people and wildlife. The area that you propose to re-open a road into is the largest non-motorized portion of your state lands in this landscape, important to me as a hiker and wildlife watcher as well as to the animals I imagine. When the road was originally closed in Stray Gulch there was discussion of the importance of its closure not only for fish and water, but for creating security habitat for elk and reducing the spread of weeds into the wildlife area. There was also recognition that in this drier portion of the wildlife area, user created expansion or extension of motorized routes is not uncommon especially when a route has live water on it as the Stray Gulch road had. I saw no discussion in your environmental checklist of wildlife species impacts, or of impacts to non-motorized recreation and wildlife viewing on the landscape. Your documentation also said there were no environmental concerns or information available that would raise concerns for opening a road in this location, but that contradicts the information your agency presents online for the Naneum Ridge to Columbia River Recreation Plan which I've been paying attention to. The impressive series of maps looking at biological and other issues across that large landscape show that Stray Gulch does raise concerns for species and special habitat features. This was not recognized at all in your documentation. Finally, I question the use of our public dollars	Thank you for your comment, however it was received after the official extended comment period.

going to construction of a road on a landscape that is going through analysis and a public process to determine the appropriate balance of recreation and protection of habitats on this landscape. I have been waiting to hear when a public comment period would open on the Naneum to Columbia River process, and only in looking for that did I learn that a road was being constructed within the planning area. In addition to that concern, it upsets me that public dollars in times of tight budgets were spent just 2 years ago to protect natural resources literally just feet away from this new road. Natural vegetation has hardly had time to respond to the closure before new construction would begin. The DNS documentation never presents a case as to why we'd reverse the decision and now spend dollars in the same location to undo a closure that was in place - it only presents a case that it is moving the road slightly upslope to hopefully prevent water running down the road as it has in the past. I am not a resident of Kittitas County, but I am a voting taxpayer of Washington State that has a vested interest in both the wildlife area and our public lands in general. I use the Colockum currently, and would be more prone to do so in the future if there were fewer roads and greater opportunities for quiet appreciation of the landscape and wildlife. I ask you to withdraw this proposal and refer to the mapping efforts conducted through the ongoing recreation planning process to find a more suitable location for access into the future.	
PHILIP RIGDON, Yakama Nation We just became aware of this project and SEPA determination by the department. The project appears to have potential for significant adverse impacts. We have not been provided adequate time to properly evaluate the project. We would therefore	

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respectfully request that the <u>comment period be extended an additional 30 days.</u>	
From our very preliminary evaluation, the project proposal has not fully evaluated, described and addressed all impacts. This road project can only be accessed by several miles of stream-adjacent roads (e.g. Tekison, Brewton Gulch) that cause adverse impacts to the stream system. The SEPA documentation has not discussed these associated, connected and cumulative impacts of the project, other than maintenance will take place on these roads.	Thank you for your comments regarding road construction in the Stray Gulch drainage of the Colockum Wildlife Area. Your concerns on sediment delivery, cumulative effects, and impacts to fish life are taken very seriously.
The SEPA documentation also had little information on the design or location of erosion control measures for the Stray Gulch Road. Where and how many drivable dips will be installed? How will the outsloped road surface be maintained with vehicular use?	We would like to clarify that the new road location is very different from the previously abandoned road location. The Stray Gulch area is important for recreational use, including hunting and wildlife viewing. We have taken great care to locate the new road away from the stream and in a stable location. There will be minimal vegetation disturbance, with no disturbance of vegetation in the riparian areas. We will be taking a multi-faceted approach to erosion and sediment control through the use of weed-free straw mulch, native grass seeding of the road surface and all exposed soils, natural contouring of the road, and use of drain dips and water bars located to maximize filtration.
How will ford crossings and their approaches be designed and constructed to prevent sediment delivery?	<u>Side Draw Crossings</u>: Crossings will exist across two side draws that flow runoff water, these side channels do not connect directly with the creek, but spread into an alluvial area. The crossings are located to allow for natural processes to take place, and the road grade will raise slightly before dipping into the drainage to prevent any surface water on the road from flowing into the crossing. Any water in the crossing should also spread and dissipate, not entering the creek. Drain dips will also be used on either side of the crossings to further separate surface runoff from the water in the drainage.
Further, the proposed project would reopen the Stray Gulch Road to vehicular use, compared to the currently closed status.	
Vehicular traffic on the road will increase erosion, sediment transport and sediment delivery. Some portions of the Stray Gulch Road would also still be in close proximity to the stream with likely impacts to water quality and stream function. All of these	

expected adverse impacts need to be adequately explained, evaluated and addressed in SEPA prior to making a decision on this project. In closing, we have not been given sufficient time to review this project for resource concerns and therefore request the comment period be extended an additional30 days. In addition, expected adverse impacts from the miles of stream-adjacent access roads, increased vehicular traffic on the Stray Gulch Road, ford crossings, other road cross drainage, and segments of the Stray Gulch Road in close proximity to the stream need to be clearly explained, evaluated and addressed in SEPA.	The road location itself was identified to allow for an out sloped road prism, to avoid steep slopes or talus, and to maximize distance from water. The design is for a primitive road with a grass surface. The minimal footprint of 10-12 feet wide is intended to minimize any impacts to the landscape.
PHILIP RIGDON, Confederated Tribes and Bands of the Yakama Nation The department provided a very brief extension to the comment period on this project. We are still evaluating the project, but have identified several issues that have not been adequately addressed and are expected to have significant adverse impacts on the environment. As such, we oppose approval of this project and request it be cancelled. The project as outlined has ample opportunity for significant adverse impacts to water quality, fish habitat, stream and riparian function, hydrology, and floodplain function. If the department is unwilling to withdraw this project, a Determination of Significance is warranted under SEPA and an Environmental Impact Statement must be required (WAC 197-11-330 (4)).	

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From our brief review, the department has failed to adequately explain or address how the project will prevent significant adverse impacts. The following are major issues we see with the project and support our position that the project has significant adverse impacts: 1. The environmental checklist contains few details on the project and measures to prevent adverse impacts. In light of incomplete or unavailable information, if the agency proceeds, it shall generally indicate in the appropriate environmental documents its worst case analysis (WAC 197-11-080 (3)). a. The checklist indicates that 1.2 miles of new road will be constructed with native material for surfacing (rock and dirt) and have outsloping and drainage dips. No specific information is provided on the location or design of the outsloping and drainage dips, or more importantly the efficacy of these measures to prevent adverse impacts to the stream system. The checklist also mentions two fords would be constructed across seasonal streams, but no details are provided on these crossings or how sediment will be kept out of streams. b. The environmental checklist notes that surface erosion may occur as a result of snowmelt or intense rain until vegetation has been re-established. This new road would be open to vehicular traffic which would prevent establishment of vegetation. Vehicular traffic on the road will increase erosion, sediment transport and sediment delivery. Chronic erosion of the road and sediment delivery to streams would be expected. Further, the road is	Response on road design: The road as located is designed to minimize road impacts to the surrounding area. The road will have a rolling grade without long stretches of continuous grade that are prone to channeling water. The road carefully follows natural topography. Drivable dips will be placed in grade sags and along mid-slopes if the grade is continuous for more than 200 feet; exact locations will be marked by a professional engineer prior to construction, and reviewed during construction for functionality. Locations will take into account road gradient, proximity to the creek, and the ability for water to channel. Sediment delivery: The previous road location was immediately adjacent to the creek and subject to erosion during high water. The new location is greater than 200 feet from the stream in most locations. The terrain between the new road and the creek is gentle topography that is currently grassed. The old abandoned road also acts as a spreader for overland flow and will slow down water velocities. The road surface will be out sloped to prevent concentration of water and minimize ground disturbance. All exposed soils and the road surface will be grass seeded to encourage

to be constructed of native material which has a much higher erosion rate than other road types (e.g. rock surfacing). c. The checklist indicates the new road would be 50 to 250 feet from the creek. Several studies have shown that sediment-laden runoff from roads can travel more than 200 feet downslope distance. The checklist provides no explanation or assurance how the new road will prevent sediment delivery to streams and other adverse impacts. 2. The checklist has virtually no mention or assessment of associated, connected or cumulative adverse impacts from this project. This project would reconnect and reopen the Stray Gulch Road. No discussion is provided on adverse impacts of the old road further up the drainage. Of greater concern, this dead-end road can only be accessed by miles of stream-adjacent roads up Tekison Creek and Brewton Gulch. These roads running up the stream bottoms have significant adverse impacts on water quality, fish habitat, and riparian and floodplain function. The roads cause sediment delivery, confine stream channels, reduce riparian vegetation, degrade fish habitat, accelerate runoff and greatly limit groundwater recharge and storage. The department did not consider or take into account these significant adverse impacts when making a threshold determination on <u>the project as required under WAC 197-11-330.</u> 3. This project completely contradicts the rationale and justification made by the department under SEPA to close the Stray Gulch and Tekison Roads in 2011. Under the checklist for SEPA DNS #11-073, the department stated, "Both roads have erosion issues, as high spring-time flows spread in the roads and damage them...We need to abandon these roads to improve water quality and	soil stability. There are a couple of sections of road that are closer than 200 feet from the creek. These locations were identified specifically as having the least impact to vegetation, talus slopes, and the terrain while still being stable and not likely to generate sediment. <u>Road Maintenance and Cumulative Effects</u>: The new road, along with the surrounding access roads will be included in the WLA road maintenance plan. WDFW is committed to continued and enhanced maintenance for the Brushy /Tekison Basins along with the entire wildlife area. The Brushy, Tekison, and Brewton Gulch Roads are all included in an upcoming maintenance project to improve drainage and prevent erosion, while still providing public access.

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protect cultural resources." Further, in response to comments on the closure, the department stated, "Research studies have overwhelming shown negative impacts of stream-adjacent roads to aquatic life…The soils along these roads are classified as gravelly sandy loams, and are highly susceptible to degradation due to disturbance. When roads run parallel and adjacent to creeks they collect and channel water which eventually finds its way back to the stream, along with sediment that has been picked up along the way." And ''Given the WDFW's mandate to protect, restore and enhance fish and wildlife and their habitats, closing these roads and improving habitats is justified." We agree with the 2011 SEPA final decision that the Stray Gulch Road needs to be abandoned to protect resources. Merely relocating a piece of the road a short distance from the stream and opening up the entire length to vehicular traffic is counter to the decision in 2011/2012. 4. The checklist says no known threatened or endangered species are on or near the site. Again, this contradicts the previous 2011 SEPA for closure of the Stray Gulch and Tekison Roads by the department which appropriately lists upper Columbia Steelhead (in or near Tekison and Stray Gulch) and Chinook salmon (in Columbia River). The department must determine the impacts of this proposal on endangered or threatened species or their habitat as required under WAC 197-11-330 (3). 5. This project and SEPA undermines and is contrary to the Colockum Wildlife Area Management Plan (CWAMP) by the department. The CWAMP has an Agency Objective to protect and restore riparian habitat and under Strategy A it states, "Implement permanent road closures in Tekison Creek and Stray Gulch. Provide alternate road access to West Bar and Brushy areas." Does the department completely ignore its own management	In response to your comments, Washington Department of Fish and Wildlife (WDFW) will be implementing a monitoring plan to verify that the expected outcomes of this project are verifiable. WDFW will be monitoring vegetation establishment, road drainage, road condition, and evidence of sediment generation. WDFW will visit the site twice a year during peak use in November and April. Monitoring will consist of visual inspection of the road surface for rutting, any channelization of water, and vegetation establishment. The old road bed will also be inspected to see if any runoff from the new road is making its way to the old road location or stream. The third point of inspection will be where the road crosses the side draws. These crossings will be reviewed for stability, evidence of sediment, and connectivity with the Stray Gulch Creek. Road usage will also be monitored to ensure that users are staying on the road and not impacting vegetation. These inspections will be documented with located photo points and field notes. WDFW plans to monitor for 3 years and continue to evaluate as part of the landscape level adaptive management plan. The agency is committed to the CWAMP and will maintain the objective.

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plans? We support road closures for the protection of fish and riparian habitat. We also support maintaining access to the wildlife area by utilizing alternate roads away from streams. In closing, there is ample evidence that this proposed project and associated access roads will have cumulative, significant adverse impacts on water quality, fish and riparian habitat, and stream and floodplain function. I am also highly disappointed that this project flies in the face of the assurance by WDFW Director Phil Anderson to me that we address problem roads in this area in a transparent and strategic manner. We were not informed or had input into this project. I highly question how this project is strategic, economically justified, or ultimately meets the overarching mandate of the department to protect, restore and enhance fish and wildlife and their habitats. I would respectfully request this project be withdrawn. Otherwise, this project warrants a Determination of Significance, and an Environmental Impact Statement must be required that fully evaluates all potential adverse impacts.	Thank you again for your comments and we look forward to working with the Yakama Nation as we further improve our wildlife areas.